

50 Harrison Street, Suite 315  
Hoboken, New Jersey 07030  
Tel: 201.792.7777  
Fax: 201.792.7771



ChronakisSiachosKaplan

www.CSKaplan.com

260 Madison Avenue, 18<sup>th</sup> Floor  
New York, New York 10016  
Tel: 212.953.0000  
Fax: 646.964.6646

**Philip C. Chronakis**  
ADMITTED IN NJ, NY AND PA  
Phil@CSKaplan.com

December 3, 2012

**Via ECF**

Hon. Cathy L. Waldor, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07101

Re: Hoffman v. Time Warner Cable, Inc.  
Civil Action No. 12-cv-978 (ES)(CLW)

Dear Judge Waldor:

This firm represents Plaintiff, Harold M. Hoffman, in the referenced action.

I write to respectfully request an additional 90-day extension of the discovery order entered by Your Honor on October 5, 2012 (*Doc. No. 29*). Time Warner Cable does not oppose Plaintiff's request.

This request is premised on the parties' goal of allowing Judge Debevoise to issue a decision on Time Warner Cable's pending Rule 12(b)(6) motion, prior to expending both sides' resources on further discovery in advance of that ruling. The transfer of the motion from Judge Salas to Judge Debevoise understandably may have delayed the motion's disposition. Plaintiff respectfully seeks to synchronize the parties' discovery efforts with the Court's ruling on the merits of the underlying claims.

If granted, this application would extend the conclusion of both parties' class discovery for 90 days from the existing January 10, 2012 deadline, and would replace the scheduled January 8, 2013 conference call with the Court for one on a new date to be determined by Your Honor.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'PC' followed by a stylized flourish.

PHILIP C. CHRONAKIS

cc: Jonathan D. Thier, Esq.  
Brian T. Markley, Esq.  
John A. Eakins, Esq.  
William E. Goydan, Esq.  
Mindy P. Fox, Esq.